

EXHIBIT B

From: [Boisvert, Caroline P.](#)
To: [Maier, Eric J.](#); [Reiser, Craig M.](#); [Yung, Eva H.](#); [Haws, Claire L.](#)
Cc: [Thorne, John](#); [Bird, Daniel G.](#); [Henningson, Sven E. \(Trip\)](#); [Sherrerd, Devon L.](#); [Davis, Tiberius T.](#)
Subject: RE: In re Google Digital Advertising Antitrust Litig. - Daily Mail Production
Date: Tuesday, March 19, 2024 9:11:16 AM
Attachments: [AxinnLogo_dd529d1a-7f78-430f-ab93-0b88b8611e63.png](#)

Counsel,

I am writing to follow-up on Daily Mail's March 16 production and the statement in your March 16 production letter that "Daily Mail is not producing documents determined to be relevant only to its claims regarding Google search that were dismissed by Judge Castel."

- We appreciate your acknowledgment that Google search is not relevant to any of Daily Mail's claims following the Court's March 1, 2024 Opinion and Order. Can you please confirm our understanding Daily Mail is no longer relying on the allegations set forth in paragraphs 77-84, 92, 201-225, and 234 of its December 2, 2022 Amended Complaint and let us know if there are other allegations on which Daily Mail is no longer relying in support of its claims?
- Likewise, can you please confirm that Daily Mail is no longer claiming damages arising from Google's alleged "steer[ing] user traffic away from Daily Mail's web properties?" Daily Mail Second Supplemental Response to Interrogatory No. 29.
- Please explain how Daily Mail determined whether documents were "relevant only to its claims regarding Google search." In particular, please identify whether Daily Mail declined to (1) run any agreed-upon search terms; (2) search the files of any agreed-upon custodians; (3) and/or treat any agreed-upon Requests for Production as go-gets.
- Finally, we understand that as of March 16, Daily Mail's production is substantially complete only as to Daily Mail's original 11 custodians and go-gets. See Mar. 16 Letter Response to Motion to Compel at 5 n.2 ("Daily mail agreed that it would substantially complete document productions . . . over Daily Mail's initial 11 proposed custodians by Mid-March."). Please confirm when Daily Mail intends to substantially complete document productions from Noah Szubski and Carly Steven.

To the extent it would be helpful to schedule a meet and confer on these issues, please let us know your availability this week.

Best,
Caroline

Caroline P. Boisvert
Associate



Axinn, Veltrop & Harkrider LLP
90 State House Square
Hartford, CT 06103
Office 860.275.8129
Fax 860.275.8101
cboisvert@axinn.com
Axinn.com

Pronouns | She, Her, Hers

From: Maier, Eric J. <emaier@kelloggghansen.com>

Sent: Saturday, March 16, 2024 11:52 PM

To: Reiser, Craig M. <creiser@axinn.com>; Yung, Eva H. <eyung@axinn.com>; Boisvert, Caroline P. <cboisvert@axinn.com>; Haws, Claire L. <chaws@axinn.com>

Cc: Thorne, John <jthorne@kelloggghansen.com>; Bird, Daniel G. <dbird@kelloggghansen.com>; Henningson, Sven E. (Trip) <shenningson@kelloggghansen.com>; Sherrerd, Devon L. <dsherrerd@kelloggghansen.com>; Davis, Tiberius T. <tdavis@kelloggghansen.com>

Subject: In re Google Digital Advertising Antitrust Litig. - Daily Mail Production

Caution:External Email

Counsel,

Please see the attached correspondence related to Associated Newspapers, Ltd. and Mail Media, Inc.'s production in response to Google LLC and Alphabet Inc.'s First Set of Requests for Production of Documents in *In re Google Digital Advertising Antitrust Litig.*, No. 21-md-03010 (S.D.N.Y.).

The volume number and password for the production are as follows:

- Volume: DM_GOOG_009
- Password: [REDACTED PASSWORD]

All the best,

Eric

Eric J. Maier

Kellogg, Hansen, Todd, Figel, & Frederick, P.L.L.C.

1615 M Street, N.W. | Suite 400 | Washington, DC 20036 | (202) 326-7923

NOTICE: This transmission is intended only for the use of the addressee and may contain information that is privileged, confidential and exempt from disclosure under applicable law. If you are not the intended recipient, or the employee or agent responsible for delivering the message to the intended recipient, you are hereby notified that any dissemination, distribution or copying of this communication is strictly prohibited. If you have received this communication in error, please notify the sender immediately via reply e-mail, and then destroy all instances of this communication. Thank you.